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11 *Plaintiffs' Interim Co-Lead Class Counsel*

12 *Additional Counsel Listed on the Signature Page*

13 **UNITED STATES DISTRICT COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA**

15 JOHN PRUTSMAN, AMIRA MARTZ,
SIMCHA RINGEL, NAIOMI MARDEN,
16 ALANA BALAGOT, CORINNE
WARREN, SUNNY LAI, AND DAVID
17 KLEIN, individually and on behalf of all
others similarly situated,

18 Plaintiffs,

19 v.

20 NONSTOP ADMINISTRATION AND
21 INSURANCE SERVICES, INC., Inclusive,

22 Defendant.

23 NATALIE NICHOLSON, individually and
on behalf of all others similarly situated,

24 Plaintiff,

25 vs.

26 NONSTOP ADMINISTRATION AND
27 INSURANCE SERVICES, INC.,

28 Defendant.

CASE NO. 3:23-CV-01131-VC

**JOINT STIPULATION & [PROPOSED]
ORDER RE: SCHEDULING**

Judge Hon. Vince Chhabria

CASE NO. 3:23-cv-03567-VC

In compliance with the Court’s direction at the initial status conference held on September 8, 2023, Plaintiffs John Prutsman, Amira Martz, Simcha Ringel, Naiomi Marden, Alana Balagot, Corrine Warren, Sunny Lai, David Klein, and Natalie Nicholson (“Plaintiffs”) and Defendant NonStop Administration and Insurance Services, Inc. (“Defendant”) (collectively the “Parties”) respectfully submit the following modified scheduling proposal.

Event	Proposed Deadline
Deadline to amend/add parties	November 20, 2023
Class Primary Expert Disclosures	April 16, 2024
Class Rebuttal Expert Disclosures	May 15, 2024
Last day to file Motion for Class Certification	May 15, 2024
Last day to file class <i>Daubert</i> motions	June 25, 2024
Opposition to Motion for Class Certification	July 15, 2024
Reply in Support of Motion for Class Certification	August 15, 2024
Hearing on Motion for Class Certification	September 19, 2024
Case Management Conference	October 11, 2024
Simultaneous Merits Expert Disclosures	October 18, 2024
Discovery cutoff	December 17, 2024
Last day to hear file Motions for Summary Judgment and Merits <i>Daubert</i> Motions	To be Set at October 11, 2024 CMC
Last day to file Oppositions to Dispositive and Merits <i>Daubert</i> motions	To be Set at October 11, 2024 CMC
Last day to file replies to Dispositive and Merits <i>Daubert</i> motions	To be Set at October 11, 2024 CMC
Final Pretrial Conference	To be Set at October 11, 2024 CMC
Trial	To be Set at October 11, 2024 CMC

IT IS SO ORDERED.

Date:

Judge Hon. Vince Chhabria

1 Dated: September 14, 2023

COLE & VAN NOTE

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3 By: /s/ Laura Van Note

4 Laura Van Note, Esq.

5 Dated: September 14, 2023

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

6
7 By: /s/ Gary M. Klinger

8 Gary M. Klinger, Esq.

9
10 *Plaintiffs' Interim Co-Lead Class Counsel*

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12 Dated: September 14, 2023

CIPRIANI & WERNER PC

13
14 By: /s/ Jill H. Fertel

15 Jill H. Fertel, Esq.

16 *Counsel for Defendant*

17 *Additional Counsel for Plaintiffs and Putative Class*

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ATTESTATION

I, Laura Van Note, hereby attest, pursuant to N.D. Cal. Civil Local Rule 5-1(h)(3), that concurrence to the filing of this document has been obtained from each signatory.

/s/ Laura Van Note

CERTIFICATE OF SERVICE

I hereby certify that, on September 14, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served today on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF and on counsel in the related cases to their respective emails per the below service list.

/s/ Laura Van Note
Laura Van Note, Esq.